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April 7, 2021

VIA EMAIL AND OVERNIGHT MAIL

Winston G. DeCuir, Jr.  
Vice President of Legal Affairs and General Counsel  
Louisiana State University  
University Administration Building  
3810 West Lakeshore Drive, Room 124  
Baton Rouge, Louisiana 70808

RE: Privacy – Student 2 in Taylor Porter Report related to LSU

Dear Mr. DeCuir:

I represent “Student 2” as identified in that investigation report of the law firm Taylor Porter into her complaints as to the former coach at LSU. It is my understanding that Sharon Lewis, LSU Associate Athletic Director of Football Recruiting and Alumni Relations intends to file a lawsuit today related to her treatment as an employee at LSU. As part of that suit, by a press conference given by Ms. Lewis’ counsel this morning, it appears that issues related to an outcry made by Student 2 may form part of the basis for Ms. Lewis’ lawsuit.

Student 2 has asked us to indicate to all parties in no uncertain terms that the release of details of her outcry, even without her identifying information, is a revictimization and would be an invasion of her privacy. Student 2 has legitimate privacy interests in the protection of and non-production of the information related to her outcry. Further, we assert that the release in any public forum, including in pleadings or discovery in a lawsuit, of any identifying information including name, location of her city or state of residence, dates of employment, date of birth, dates of attendance as a student, and any other related information would lead to her identification, her revictimization, and would be a serious invasion of her privacy. Therefore, we must demand on behalf of Student 2 that this information be kept confidential and not disclosed publicly, and that it be sealed from public view in any and every potential forum.

Sincerely,



Charles H. Peckham

cc.

Client

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